

REMARKS

Herein, the "Action" or "Office Action" refers to the Office Action dated November 26, 2003.

Applicant respectfully requests entry of the following remarks and reconsideration of the subject application. Applicant respectfully requests entry of the amendments herein. The remarks and amendments should be entered under 37 C.F.R. §1.116 as they place the application in better form for appeal, or for resolution on the merits.

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1-13, 23, 24, 35, and 39-56 are presently pending. Herein, claims 41 and 43 are amended. Herein, no claims are withdrawn, cancelled, or added.

Opportunity to Respond to Rejection of Claims 39 and 40

In the "Office Action Summary" page of the Action, claims 39 and 40 are included amongst those rejected. However, the body of the Action lacks any discussion of a rejection of these claims.

Applicant asks for a clarification on the status of these claims. If they indeed stand as rejected, Applicant asks the Office give Applicant an opportunity to respond to the rejection.

Opportunity to Respond to Rejection of Claim 48

In this Action, the Office did not provide any objective evidence (e.g., by citing specific portions of particular references) for a large portion of the recited

1 elements and features of claim 48. Applicant submits that it is unable to
2 adequately respond to the Office's rejection of this claim.

3 Applicant asks the Office give Applicant an opportunity to respond to the
4 rejection.

5 **Claim Amendments**

6 Herein, Applicant amends claim 41 only to correct a minor
7 grammatical/typographical oversight. It is not done for any statutory reason. It is
8 not done to over come any cited references. Applicant amends claim 43 to clarify
9 the language of that claim.

11 **Substantive Claim Rejections**

13 **Claim Rejections under §102 and §103**

14 The Office rejects all pending claims under §102 and/or §103. For the
15 reasons set forth below, the Office has not shown that cited references anticipate
16 (under §102) the rejected claims. For the reasons set forth below, the Office has
17 not made out a *prima facie* case of obviousness (under §103). Accordingly,
18 Applicant respectfully requests that the rejections be withdrawn and the case be
19 passed along to issuance.

20 The Office's rejections are based upon the following references:

- 21 • **Griffin;**
- 22 • **Smith, Jody K. Smith**, U.S. Patent No. 6,018,748.

Overview of the Application

To allow search engines to index their sites, dynamic sites (such as e-commerce sites with inventory) periodically generate “snapshots” of their dynamic Web pages. These snapshots are static Web pages generated from corresponding dynamic Web pages, which are generated at a moment in time.

However, there are several significant drawbacks to the “snapshot” approach. In a short period of time, the snapshots no longer represent the current inventory. Periodically generating the snapshots consumes processing and storage resources. The Application describes techniques that convert the address of dynamic Web pages in a manner that overcomes the drawbacks of the “snapshot” approach.

A Web address converter, described in the Application, helps dynamic Web sites get the attention of the spiders of Internet search engines. With the Web address converter, requests from Web browsers using static addresses access corresponding dynamic Web pages and requests from search engines generate an instance of a Web page having links with static addresses pointing to corresponding dynamic Web pages.

The Web address converter performs both Dynamic-to-Static (D-to-S) address conversion and Static-to-Dynamic (S-to-D) address conversion. D-to-S address conversion is done when generating a spider-friendly main page for a spider of a search engine to crawl. S-to-D address conversion is used when a browser uses a static address to access a corresponding dynamic Web page. The static address that the browser uses was originally created when the spider-friendly main page was generated.

Cited References

The Office cites **Griffin** as its primary reference in all of its obviousness rejections. The Office cites **Smith** as its secondary reference in its obviousness rejections.

Griffin

Griffin describes centralized product testing system with a test application server that communicates with remote users as a web-based application. Equipment testers login to the system through their web browser. They can then run tests while viewing instructions for the test and entering results in dynamically-generated web browser forms tailored to their test.

Completed forms (including files generated by test equipment tied to a tester's computer) can then be uploaded to the testing system. The testing system relates the test data to the product under test and stores the data in a relational database. The test data can then be used to dynamically generate preliminary or formal test reports for compliance and other purposes.

Smith

Smith describes techniques for creating and displaying dynamic link labels in a browser program operating on a remote user station in a computer network where remote user stations retrieve information from other sites in the network. The link labels are created in an application program which can be run within the

1 browser, and the link labels are designed to operate, at a minimum, in a similar
 2 manner as HTML hyperlinks.

3 The link labels can also dynamically change in response to user input into
 4 the browser. For instance, the URL (Uniform Resource Locator) address or the
 5 text or appearance of the link label can change. Also, parameters based on user
 6 input can be formed by the application and used to form or alter other link labels.

7 Static v. Dynamic

8
 9 It is important to understand the meaning of and the differences between
 10 “static” and “dynamic” *Web pages*, and the meaning of and the differences
 11 between “static” and “dynamic” *addresses*. *In general, pp. 1 and 2 of the*
 12 *Application discuss these terms.*

13 Static Web Page: A *static Web page* is pre-generated and stored intact on a
 14 Web server.

15 Static Address: A *static address* is a “unique Web address (e.g., a URL)”
 16 that addresses a specific static Web page. A typical URL for a static Web page
 17 looks like this: *http://domain.name.com/pagename.htm.*

18 Dynamic Web Page: A *dynamic Web page* is generated at the moment the
 19 page is accessed using data that is not stored intact on a Web server.

20 Dynamic Address: A *dynamic address* is a unique Web address (e.g., a
 21 URL) that triggers the generation of a dynamically created Web page by a Web
 22 server. A typical URL for a dynamic Web page may look like this:
 23 *http://domain.name.com/pagename.asp?parm1=val1&parm2=val2.*

Anticipation Rejections

Based upon Griffin

The Office rejects claims 23, 44, 46, 47, 50, 53, and 55 under USC § 102(e) as being anticipated by **Griffin**. Applicant respectfully traverses the rejections of these claims. Based on the reasons given below, Applicant asks the Office to withdraw its rejection of these claims.

In order to anticipate these claims, Applicant submits that **Griffin** must disclose every element and feature of the claims and that they must be arranged in the same manner as the claims. Applicant respectfully submits that **Griffin** does not disclose all of the claimed elements and features of these claims.

Claim 23

With the portions of **Griffin** which are cited by the Office provided in brackets, this claim recites:

- receiving a dynamic address pointing to a dynamic Web page; [col. 4, lines 5-30]
- converting the dynamic address to a static address also pointing to the dynamic Web page. [col. 3, lines 22-64]

The Office indicates that **Griffin** discloses, at col. 3, lines 22-64, the conversion of a “dynamic address to a static address also pointing to the dynamic Web page” (as recited in this claim). The following is the cited text from **Griffin**:

FIG. 2 shows the logical configuration of the embodiment of FIG. 1. Application core 40 resides on the test application server and performs most of the "work" of the system with Perl scripts. Core 40 is connected to peripheral functions 46 and 48. Database interface 46 performs database extract and store operations with relational database 42, which resides on the database server. Web interface 48 (e.g., a web server) transmits web pages to users and receives uniform resource locator requests back from those users. Finally, application core 40 is connected to a template repository 44 that contains test templates and report templates. Repository 44 may, e.g., store each template as a separate file in a disk folder.

Using the Testing System

A user accesses a testing system home page from within their web browser in order to use the system. FIG. 3 shows a typical home page display 50 for an embodiment named the "Job Log System", or JLS. The home page contains selections for major JLS functions and links for obtaining JLS accounts and job numbers.

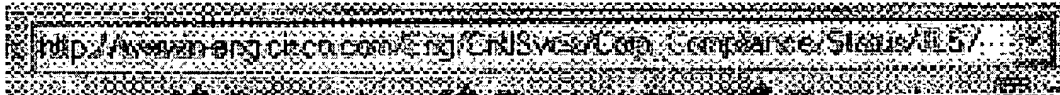
Preferably, access to the testing system beyond the home page is limited. Access is controlled in JLS by issuing accounts, and requiring users to login to the system before accessing test data. JLS maintains an account for each user, with the account tracking the user's name, phone/pager numbers, testing discipline, business unit, and location. JLS has the capability to verify and/or update account information by accessing a personnel database on a separate server (not shown).

Once a user has an account on JLS, they may login to the system and conduct testing. The first step in a new test program is obtaining a "job number" that can be used to identify the product under test. In JLS, a user selects the link "Get a New Job Number" from the home page displayed on their browser in order to request a new job number. The test application server receives this request, reserves an unused job number, and sends a browser form, requesting information about the job, to the user's browser. Job information includes a name for the responsible engineer, the product name, product code name, discipline of the product, the number of configurations tested, and any comments.

Applicant submits that the above cited text of **Griffin** fails to disclose any conversion. Applicant respectfully requests the Office to indicate the particular portion of this text that discloses a conversion of one type of address to another; in particular, where **Griffin** discloses conversion of a "dynamic address...into a static address."

1 The cited text of **Griffin** does not mention or discuss any static addresses.
2 It does not mention or discuss any dynamic addresses. It does not mention or
3 discuss any dynamic Web pages.

4 The only address that Applicant could locate that is inferentially referenced
5 is the address listed in the address bar of the "typical home page display 50"
6 illustrated in Fig. 3. The address in that bar is cut-out, enlarged, and shown here in
7 Fig. A:



11 Fig. A

12
13 Applicant submits that this address is static. **Griffin** never describes this
14 address as dynamic and this address matches the exemplary static address
15 provided in the Application, which is http://domain.name.com/pagename.htm.

16 Applicant submits that the "typical home page display 50" illustrated in
17 Fig. 3 is static as well. **Griffin** never describes this Web page as one that is
18 created the moment the page is accessed. **Griffin** never describes this Web page as
19 one that is not stored intact on a Web server, but, instead, is generated anew each
20 time it is accessed.

21 Applicant submits that this is merely the conventional situation of a static
22 address pointing to a static Web page.

23 Applicant submits that the Office has not shown that **Griffin** discloses a
24 conversion of a "dynamic address to a static address also pointing to the dynamic
25 Web page" (as recited in this claim).

1 For the reasons given above, **Griffin** does not disclose all of the claimed
2 elements and features of this claim. Accordingly, Applicant asks the Office to
3 withdraw its rejection of this claim.

4
5 Claim 24

6 This claim ultimately depends upon independent claim 23. As discussed
7 above, claim 23 is allowable.

8 In addition to its own merits, this dependent claim is allowable for the same
9 reasons that its base claim is allowable. Applicant submits that the Office
10 withdraw the rejection of this dependent claim because its base claim is allowable.

11
12 Claim 44

13 With the portions of **Griffin** which are cited by the Office provided in
14 brackets, this claim recites:

- 15
- 16 • convert a static address pointing to a dynamic Web page into a
17 dynamic address that also points to the dynamic Web page. [col. 3,
18 lines 35-42 and col. 5, lines 25-45]

19 The Office indicates that **Griffin** discloses, at col. 3, lines 35-42 and col. 5,
20 lines 25-45, the conversion of a “static address pointing to a dynamic Web page
21 into a dynamic address that also points to the dynamic Web page” (as recited in
22 this claim).

1 While col. 3, lines 35-42 is quoted above, the following is col. 5, lines 25-
2 45 from **Griffin**:

3
4 A user selects a link or button on a test system-generated browser
5 form. The user's web browser sends a corresponding request to a web server
6 application running on the test application server, i.e., step A in FIG. 7. For
7 instance, the request may contain the uniform resource locator (URL)

8
9 `http://.about.JLS/jobtest/emc_test.pl?emc_test_page=burst/
10 burst_report.html&job_number=430&old_job_number=430&test_
11 details_number=1367`

12 The file "emc--test.pl" is a Perl script located on the test application
13 server. The web server runs this script as step B in FIG. 7. The information after
14 the "?" in the URL above is converted to a series of command-line parameters
15 and passed to the script. For instance, the parameter "emc_test_page" has a
16 value "burst/burst_report.html" the location of an HTML template file to be
17 used to build the requested page. The parameter "job_number" has a value
18 "430", and the parameter "test details_number" has a value "1367"--these values
19 identify the job and test that are to be accessed. The job number and test
20 details number get set by a user on previous web forms, and are then passed
21 from form to form to be automatically included in URLs.

22 Applicant submits that the above cited text of **Griffin** fails to disclose any
23 conversion. Applicant respectfully requests the Office to indicate the particular
24 portion of this text that discloses a conversion of one type of address to another; in
25 particular, where **Griffin** discloses conversion of a "static address...into a
dynamic address."

26 The address disclosed in col. 5, lines 25-45 is a dynamic address. However,
27 as is conventional, it is one that points to a dynamic Web page. Applicant makes
28 that conclusion because col. 5, lines 34-36 says, "the file 'emc--test.pl' [which is
29 part of the address provided on lines 31-33] is a Perl script.... The web server
30 runs this script as step B in FIG. 7." Later, in the description of step F (col. 5,

1 lines 60-62), **Griffin** describes the server as sending a just-generated Web page
2 over the network to the user's Web browser.

3 In accordance with its description of a dynamic Web page provided in the
4 Application, Applicant submits that the Web page produced by step F of Fig. 7 of
5 **Griffin** is not stored intact on the Web server, but, instead, is generated anew each
6 time it's Perl script is accessed.

7 Applicant submits that this is merely the conventional situation of a
8 dynamic address pointing to a dynamic Web page.

9 Applicant submits that the Office has not shown that **Griffin** discloses a
10 conversion of a "static address pointing to a dynamic Web page into a dynamic
11 address that also points to the dynamic Web page" (as recited in this claim).

12 For the reasons given above, **Griffin** does not disclose all of the claimed
13 elements and features of this claim. Accordingly, Applicant asks the Office to
14 withdraw its rejection of this claim.

15
16 Claim 46

17 With the portions of **Griffin** which are cited by the Office provided in
18 brackets, this claim recites:

- 19
- 20 • convert a dynamic address pointing to a dynamic Web page into a
21 static address also pointing to the dynamic Web page. [col. 3, lines
22 22-64]
23
24
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1 The Office indicates that **Griffin** discloses, at col. 3, lines 22-64, the
2 conversion of a “dynamic address pointing to a dynamic Web page into a static
3 address also pointing to the dynamic Web page” (as recited in this claim).

4 Applicant submits that the above cited text of **Griffin** fails to disclose any
5 conversion. Applicant respectfully requests the Office to indicate the particular
6 portion of this text that discloses a conversion of one type of address to another; in
7 particular, where **Griffin** discloses conversion of a “dynamic address...into a
8 static address.”

9 This claim is allowable for, at least, the same reasons given above for claim
10 23 above.

11 Applicant submits that the Office has not shown that **Griffin** discloses a
12 conversion of a “dynamic address pointing to a dynamic Web page into a static
13 address also pointing to the dynamic Web page” (as recited in this claim).

14 For the reasons given above, **Griffin** does not disclose all of the claimed
15 elements and features of this claim. Accordingly, Applicant asks the Office to
16 withdraw its rejection of this claim.

17
18 Claim 47

19 With the portions of **Griffin** which are cited by the Office provided in
20 brackets, this claim recites:
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- generate an instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page; [col. 4, liens 5-30]
- convert the dynamic address into a static address that also points to the dynamic Web page. [col. 3, lines 22-64]

The Office indicates that **Griffin** discloses, at col. 3, lines 22-64, the conversion of a “dynamic address into a static address that also points to the dynamic Web page” (as recited in this claim).

Applicant submits that the above cited text of **Griffin** fails to disclose any conversion. Applicant respectfully requests the Office to indicate the particular portion of this text that discloses a conversion of one type of address to another; in particular, where **Griffin** discloses conversion of a “dynamic address...into a static address.”

This claim is allowable for, at least, the same reasons given above for claim 23 above.

Applicant submits that the Office has not shown that **Griffin** discloses a conversion of a “dynamic address into a static address that also points to the dynamic Web page” (as recited in this claim).

For the reasons given above, **Griffin** does not disclose all of the claimed elements and features of this claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claim 50

With the portions of **Griffin** which are cited by the Office provided in brackets, this claim recites:

- convert a dynamic address pointing to a dynamic Web page into a static address that also points to the dynamic Web page. [col. 3, lines 35-42 and col. 5, lines 25-45]

The Office indicates that **Griffin** discloses, at col. 3, lines 35-42 and col. 5, lines 25-45, the conversion of a “dynamic address pointing to a dynamic Web page into a static address that also points to the dynamic Web page” (as recited in this claim).

Applicant submits that the above cited text of **Griffin** fails to disclose any conversion. Applicant respectfully requests the Office to indicate the particular portion of this text that discloses a conversion of one type of address to another; in particular, where **Griffin** discloses conversion of a “dynamic address...into a static address.”

This claim is allowable for, at least, the same reasons given above for claim 23 above.

Applicant submits that the Office has not shown that **Griffin** discloses a conversion of a “dynamic address pointing to a dynamic Web page into a static address that also points to the dynamic Web page” (as recited in this claim).

For the reasons given above, **Griffin** does not disclose all of the claimed elements and features of this claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claim 53

With the portions of **Griffin** which are cited by the Office provided in brackets, this claim recites:

- receiving a request for a dynamic Web page, wherein the request includes a static address pointing to the dynamic Web page; [col. 3, lines 22-63 and col. 4, lines 5-30]
- converting the static address to a dynamic address that also points to the dynamic Web page [col. 3, lines 22-63 and col. 5, lines 20-45]

The Office indicates that **Griffin** discloses, at col. 3, lines 22-63 and col. 5, lines 20-45, the conversion of a “static address to a dynamic address that also points to the dynamic Web page” (as recited in this claim).

Applicant submits that the above cited text of **Griffin** fails to disclose any conversion. Applicant respectfully requests the Office to indicate the particular portion of this text that discloses a conversion of one type of address to another; in particular, where **Griffin** discloses conversion of a “static address...into a dynamic address.”

This claim is allowable for, at least, the same reasons given above for claims 44 above.

Applicant submits that the Office has not shown that **Griffin** discloses a conversion of a “static address to a dynamic address that also points to the dynamic Web page” (as recited in this claim).

For the reasons given above, **Griffin** does not disclose all of the claimed elements and features of this claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claim 55

With the portions of **Griffin** which are cited by the Office provided in brackets, this claim recites:

- receiving a dynamic address pointing to a dynamic Web page; [col. 3, lines 15-63 and col. 5, lines 25-45]
- converting the dynamic address to a static address that also points to the dynamic Web page. [col. 5, lines 20-45]

The Office indicates that **Griffin** discloses, at col. 5, lines 20-45, the conversion of a “dynamic address to a static address that also points to the dynamic Web page” (as recited in this claim).

Applicant submits that the cited text of **Griffin** fails to disclose any conversion. Applicant asks the Office to point out the exact portion of text that discloses a any static/dynamic address conversion.

This claim is allowable for, at least, the same reasons given above for claim 23 above.

Applicant submits that the Office has not shown that **Griffin** discloses a conversion of a “dynamic address to a static address that also points to the dynamic Web page” (as recited in this claim).

For the reasons given above, **Griffin** does not disclose all of the claimed elements and features of this claim. Accordingly, Applicant asks the Office to withdraw its rejection of this claim.

Claim 56

This claim ultimately depends upon independent claim 55. As discussed above, claim 55 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of this dependent claim because its base claim is allowable.

Obviousness Rejections

Lack of *Prima Facie* Case of Obviousness (MPEP § 2142)

Applicant disagrees with the Office's obviousness rejections. Arguments presented herein point to various aspects of the record to demonstrate that all of the criteria set forth for making a *prima facie* case have not been met.

Based upon Griffin and Smith

The Office rejects claims 1-13, 24, 35, 41-43, 45, 48, 49, 51, 52, 54, and 56 under USC § 103(a) as being unpatentable over **Griffin and Smith**. Applicant respectfully traverses the rejections of these claims. Applicant asks the Office to withdraw its rejection of these claims.

Claim 1

This claim recites:

- generating an instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page; and

- 1 • converting the dynamic address into a static address that also points
2 to the dynamic Web page.

3
4 The Office indicates that **Smith** discloses (at col. 5, lines 10-35 and col. 5,
5 lines 56-65) “generating an instance of a main Web page having at least one link
6 with a dynamic address pointing to a dynamic Web page” (as recited in the claim).

7 Applicant submits that the links disclosed by **Smith** have static addresses
8 because they point to static Web pages (40 of Fig. 1). At col. 4, lines 4-12, **Smith**
9 states that the “data processing system...places a plurality of web pages 40 for
10 access by remote client stations 35 over network 46....Web pages 40 can contain
11 data including text, graphics, audio files, video files, and other forms of data.”

12 Smith’s Web pages are stored intact on a Web server and are not generated
13 anew each time the page is accessed. There is nothing disclosed in **Smith** to
14 conclude that its pages are dynamic.

15 Applicant submits that the Office has not shown that **Smith** discloses
16 “generating an instance of a main Web page having at least one link with a
17 dynamic address pointing to a dynamic Web page” (as recited in the claim).

18 For this reason alone, Applicant submits that the obvious rejection should
19 be withdrawn because the combination of the teachings of **Griffin** and **Smith** fails
20 to disclose all of the features and elements recited in this claim.

21 Furthermore, the Office indicates that **Griffin** discloses (at col. 3, lines 35-
22 42 and col. 5, lines 25-45) “converting the dynamic address into a static address
23 that also points to the dynamic Web page” (as recited in the claim).

1 In the discussion of the Office's anticipation rejection of claim 23,
2 Applicant explains why **Griffin** does not disclose a conversion from a "dynamic"
3 to a "static address." Therefore, the reasoning given there apply here as well.

4 Applicant submits that the cited text of **Griffin** fails to disclose any
5 conversion. Applicant asks the Office to point out the exact portion of text that
6 discloses a any static/dynamic address conversion.

7 Applicant submits that **Griffin** merely discloses the conventional situations
8 of a static address pointing to a static Web page and of a dynamic address pointing
9 to a dynamic Web page.

10 Applicant submits that the Office has not shown that **Griffin** discloses a
11 conversion of a "dynamic address into a static address that also points to the
12 dynamic Web page" (as recited in this claim). Therefore, the combination of the
13 teachings of **Griffin** and **Smith** fails to disclose all of the features and elements
14 recited in this claim.

15 Accordingly, Applicant asks that the Office withdraw its rejection of these
16 claims.

17
18 Claims 2-7

19 These claims ultimately depends upon independent claim 1. As discussed
20 above, claim 1 is allowable.

21 In addition to its own merits, each of these dependent claims is allowable
22 for the same reasons that its base claim is allowable. Applicant submits that the
23 Office withdraw the rejection of each of these dependent claims because its base
24 claim is allowable.

Claim 8

This claim recites:

- receiving a request for a dynamic Web page, the request including a static address pointing to the dynamic Web page; and
- converting the static address to a dynamic address also pointing to the dynamic Web page.

The Office indicates that **Smith** discloses (at col. 5, lines 10-65) a “request [for a dynamic Web page] including a static address pointing to the dynamic Web page” (as recited in the claim).

Applicant submits that **Smith** discloses Web pages being requested using a dynamically created “link”. While the link may be dynamically created, **Smith** (and especially the cited portion) does not disclose that the link includes a “static” address that address points to a “dynamic Web page.”

Indeed, the Web pages (40 of Fig. 1) of **Smith** are “static.” At col. 4, lines 4-12, **Smith** states that the “data processing system...places a plurality of web pages 40 for access by remote client stations 35 over network 46....Web pages 40 can contain data including text, graphics, audio files, video files, and other forms of data.”

Applicant submits that this sounds like **Smith**’s Web pages are stored intact on a Web server and are not generated anew each time the page is accessed. Regardless, the Office has not shown objective evidence in **Smith** that supports a conclusion that its web pages are “dynamic.”

1 Applicant submits that the Office has not shown that **Smith** discloses a
2 "request [for a dynamic Web page] including a static address pointing to the
3 dynamic Web page" (as recited in the claim).

4 In addition, the Office indicates that **Griffin** discloses (at col. 3, lines 35-42
5 and col. 5, lines 25-45) conversion of a "static address to a dynamic address also
6 pointing to the dynamic Web page" (as recited in the claim).

7 In the discussion of the Office's anticipation rejection of claim 44,
8 Applicant explains why **Griffin** does not disclose a conversion from a "static" to
9 a "dynamic" address. Therefore, the reasoning given there apply here as well.

10 Applicant submits that the Office has not shown that **Griffin** discloses a
11 conversion of a "static address to a dynamic address also pointing to the dynamic
12 Web page" (as recited in this claim).

13 Therefore, the combination of the teachings of **Griffin** and **Smith** fails to
14 disclose all of the features and elements recited in this claim. Accordingly,
15 Applicant asks that the Office withdraw its rejection of these claims.

16
17 Claims 9-13

18 These claims ultimately depends upon independent claim 8. As discussed
19 above, claim 8 is allowable.

20 In addition to its own merits, each of these dependent claims is allowable
21 for the same reasons that its base claim is allowable. Applicant submits that the
22 Office withdraw the rejection of each of these dependent claims because its base
23 claim is allowable.
24
25

Claim 24

This claim ultimately depends upon independent claim 23. As discussed above, claim 23 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of this dependent claim because its base claim is allowable.

Claim 35

This claim recites:

- receiving a request for a dynamic Web page from a computer on a network, the request including a static Web address pointing to the dynamic Web page;
- generating an instance of the dynamic Web page such that contents of the instance appears as a static Web page; and
- sending the dynamic Web page to the computer.

The Office indicates that **Griffin** discloses (at col. 4, lines 5-30) a “request including a static Web address pointing to the dynamic Web page” (as recited in the claim).

Col. 4, lines 5-30 **Griffin** reads as follows:

Once a job has been created in the database, users can access that job, add tests and test information to that job, and view information for tests already related to that job. To perform these functions, users input a job number into the JLS home page 50 at input box 52 and select one of the links “Test Initiation”, “Test Execution”, or “Test Report Completion”.

1 Test Initiation By following the link "Test Initiation", Users may complete
2 a pre-test plan or add data common to all tests. The "Test Initiation" link calls a
3 page with a sequential list of all the steps that must be completed prior to
4 testing. The "New Account" function and the "New Job Number" functions
5 from the home page are available on this page. The "Test Initiation" page also
6 contains a link to a Test Assessment Plan that contains a series of forms used to
7 collect and distribute the user's test planning information. This test plan
8 information can then be critiqued by other engineers to insure the intended
9 test setup and tests to be performed are correct and appropriate.

10 The last set of links on the "Test Initiation" page help the user to add
11 samples, chassis, configurations, modes, and cable arrangements into JLS. This
12 data is usually referenced multiple times during the testing process. Once this
13 data is entered, the user can refer to it during testing by simply clicking a
14 checkbox or radio button..

15 Applicant submits that the above cited text of **Griffin** fails to disclose any
16 request that includes "a static Web address pointing to [a] dynamic Web page."
17 This cited text never mentions or describes a static address. Since the static
18 address is not mentioned, it is incapable of pointing to a dynamic Web page.
19 Applicant asks the Office to point out the exact portion of text that discloses a
20 request that includes "a static Web address pointing to [a] dynamic Web page."

21 Applicant submits that the Office has not shown that **Griffin** discloses a
22 "request including a static Web address pointing to the dynamic Web page" (as
23 recited in this claim).

24 Therefore, the combination of the teachings of **Griffin** and **Smith** fails to
25 disclose all of the features and elements recited in this claim. Accordingly,
Applicant asks that the Office withdraw its rejection of these claims.

Claim 41

With the portions of the references cited by the Office in brackets, this
claim recites:

- a Web server hosting a dynamic Web site; [**Smith**, abstract, col. 5, lines 10-65]
- a database storing data used by the Web server to generate dynamic Web pages of the dynamic Web site, the database being operatively coupled to the Web site; [**Smith**, abstract, col. 5, lines 10-65]
- a static to dynamic (S-to-D) Web address converter, the converter being operatively coupled to the Web server; [**Griffin**, col. 3, lines 22-64]
- the S-to-D Web address converter being configured to convert a static address to a dynamic address pointing to a dynamic Web page. [**Griffin**, col. 3, lines 35-42 and col. 5, lines 25-45]

The Office indicates that **Smith** discloses a “database storing data used by the Web server to generate dynamic Web pages of the dynamic Web site” (as recited in the claim).

Applicant submits that **Smith** (and especially the cited portions) never mentions a database. Indeed, the word “database” is never used in **Smith**. Furthermore, **Smith** never discloses any device that has a function described as “storing data used by [a] Web server to generate dynamic Web pages of [a] dynamic Web site.” Applicant asks the Office to point to the specific text of **Smith** that disclose a “database” that performs such a function.

Applicant submits that the Office has not shown that **Smith** discloses a “database storing data used by the Web server to generate dynamic Web pages of the dynamic Web site” (as recited in the claim).

In addition, the Office indicates the **Griffin** discloses (at col. 3, lines 35-42 and col. 5, lines 25-45) “S-to-D [static to dynamic] Web address converter being

1 configured to convert a static address to a dynamic address pointing to a dynamic
2 Web page” (as recited in the claim).

3 In the discussion of the Office’s anticipation rejection of claim 44,
4 Applicant explains why **Griffin** does not disclose a conversion from a “static” to a
5 “dynamic” address. Therefore, the reasoning given there applies here as well.

6 Applicant submits that the Office has not shown that **Griffin** discloses a “S-
7 to-D [static to dynamic] Web address converter being configured to convert a
8 static address to a dynamic address pointing to a dynamic Web page” (as recited in
9 this claim). Therefore, the combination of the teachings of **Griffin** and **Smith**
10 fails to disclose all of the features and elements recited in this claim.

11 Accordingly, Applicant asks that the Office withdraw its rejection of these
12 claims.
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421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leeandhayes.com

lee&hayes

Claim 42

This claim recites:

- a Web server hosting a dynamic Web site;
- a database storing data used by the Web server to generate dynamic Web pages of the dynamic Web site, the database being operatively coupled to the Web server; and
- a dynamic to static (D-to-S) Web address converter, the converter being operatively coupled to the Web server;
- the D-to-S Web address converter being configured to convert a dynamic address pointing to a dynamic Web page into a static address also pointing to the dynamic Web page.

The Office indicates that **Smith** (in the abstract and at col. 5, lines 10-65) discloses a “database storing data used by the Web server to generate dynamic Web pages of the dynamic Web site” (as recited in the claim).

Applicant submits that **Smith** (and especially the cited portions) never mentions a database. Indeed, the word “database” is never used in **Smith**. Furthermore, **Smith** never discloses any device that has a function described as “storing data used by [a] Web server to generate dynamic Web pages of [a] dynamic Web site.” Applicant respectfully requests the Office to point to the specific text of **Smith** that disclose a “database” that performs such a function.

Applicant submits that the Office has not shown that **Smith** discloses a “database storing data used by the Web server to generate dynamic Web pages of the dynamic Web site” (as recited in the claim).

1 In addition, the Office indicates the **Griffin** discloses (at col. 3, lines 35-42
2 and col. 5, lines 25-45) “D-to-S [dynamic-to-static] Web address converter being
3 configured to convert a dynamic address pointing to a dynamic Web page into a
4 static address also pointing to the dynamic Web page” (as recited in the claim).

5 In the discussion of the Office’s anticipation rejection of claim 23,
6 Applicant explains why **Griffin** does not disclose a conversion from a “dynamic”
7 to a “static” address. Therefore, the reasoning given there apply here as well.

8 Applicant submits that the Office has not shown that **Griffin** discloses a
9 “D-to-S [dynamic-to-static] Web address converter being configured to convert a
10 dynamic address pointing to a dynamic Web page into a static address also
11 pointing to the dynamic Web page” (as recited in this claim). Therefore, the
12 combination of the teachings of **Griffin** and **Smith** fails to disclose all of the
13 features and elements recited in this claim.

14 Accordingly, Applicant asks that the Office withdraw its rejection of these
15 claims.

Claim 43

This claim recites:

- a processor;
- a request receiver executable on the processor to receive a request including a static address of a main Web page;
- a spider-friendly Web page generator executable on the processor to:
 - receive the static address of the main Web page from the request receiver;
 - in response to receiving the static address, generate an instance of the main Web page having at least one link with an address pointing to a dynamic Web page.

Applicant submits that the Office has not shown that **Griffin** discloses spider-friendly Web page generator that “in response to receiving [a] static address, generate[s] an instance of the main Web page having at least one link with an address pointing to a dynamic Web page” (as recited in this claim). Therefore, the combination of the teachings of **Griffin** and **Smith** fails to disclose all of the features and elements recited in this claim.

Accordingly, Applicant asks that the Office withdraw its rejection of these claims.

Claim 45

This claim recites:

- a processor;
- a static to dynamic (S-to-D) Web address converter executable on the processor to:
 - parse a static address to identify at least one value associated with a field within the static address; and
 - generating a dynamic address incorporating at least one value associated with the field, wherein the dynamic address points to the dynamic Web page.

The Office indicates the **Smith** discloses (at col. 5, lines 10-35) “generating a dynamic address incorporating at least one value associated with [a] field [parsed from a static address], wherein the dynamic address points to the dynamic Web page” (as recited in the claim).

Applicant submits that **Smith** discloses Web pages being requested using a dynamically created “link”. While the link may be dynamically created, **Smith** (and especially the cited portion) does not disclose that the link is a “dynamic address points to the dynamic Web page.”

Indeed, Applicant submits that the Web pages (40 of Fig. 1) of **Smith** appear to be “static.” At col. 4, lines 4-12, **Smith** states that the “data processing system...places a plurality of web pages 40 for access by remote client stations 35 over network 46....Web pages 40 can contain data including text, graphics, audio files, video files, and other forms of data.”

1 Applicant submits that this sounds like Smith's Web pages are stored intact
2 on a Web server and are not generated anew each time the page is accessed.
3 Regardless, the Office has not shown objective evidence in **Smith** that supports a
4 conclusion that its web pages are "dynamic."

5 Furthermore, the cited text of **Smith** does not disclose inclusion of a "field"
6 which was parsed from a static address.

7 Applicant submits that the Office has not shown that **Smith** discloses
8 "generating a dynamic address incorporating at least one value associated with [a]
9 field [parsed from a static address], wherein the dynamic address points to the
10 dynamic Web page" (as recited in the claim). Therefore, the combination of the
11 teachings of **Griffin** and **Smith** fails to disclose all of the features and elements
12 recited in this claim.

13 Accordingly, Applicant asks that the Office withdraw its rejection of these
14 claims.

15
16 Claim 48

17 This claim recites:

- 18 • a Web server for dynamically generating an instance of a dynamic Web
19 page in response to a request; and
 - 20 • a static to dynamic (S-to-D) Web address converter;
 - 21 • the Web server being configured to send a Web address of the request to
22 the converter;
 - 23 • the converter being configured to:
 - 24 ○ receive the Web address of the request;
- 25

- determine if the Web address is a static address; and
- convert the static address to a dynamic address that also points to the dynamic Web page.

The Office indicates the **Griffin** discloses (at col. 3, lines 22-64 and col. 5, lines 20-46) “a Web server for dynamically generating an instance of a dynamic Web page in response to a request” (as recited in the claim).

However, the Office does not specify which portions of **Griffin** or **Smith** disclose any of the remainder of this claim. The Office has not provided any objective evidence that discloses the following recitation of this claim:

- a static to dynamic (S-to-D) Web address converter;
- the Web server being configured to send a Web address of the request to the converter;
- the converter being configured to:
 - receive the Web address of the request;
 - determine if the Web address is a static address; and
 - convert the static address to a dynamic address that also points to the dynamic Web page.

Since the Office has not provided any objective evidence (e.g., by citing specific portions of particular references), Applicant submits that it is unable to adequately respond to the Office’s rejection.

Furthermore, Applicant submits that the lack of objective evidence fails to show that the combination of the teachings of **Griffin** and **Smith** fails to disclose all of the features and elements recited in this claim.

1 Accordingly, Applicant asks that the Office withdraw its rejection of these
2 claims.

3
4 Claim 49

5 This claim ultimately depends upon independent claim 48. As discussed
6 above, claim 48 is allowable.

7 In addition to its own merits, this dependent claim is allowable for the same
8 reasons that its base claim is allowable. Applicant submits that the Office
9 withdraw the rejection of this dependent claim because its base claim is allowable.
10

11 Claim 51

12 This claim ultimately depends upon independent claim 50. As discussed
13 above, claim 50 is allowable.

14 In addition to its own merits, this dependent claim is allowable for the same
15 reasons that its base claim is allowable. Applicant submits that the Office
16 withdraw the rejection of this dependent claim because its base claim is allowable.
17

18 Claim 52

19 This claim recites:

- 20
- 21 • generating an instance of a spider-friendly Web page having at least one
 - 22 link with a dynamic address pointing to a dynamic Web page; and
 - 23 • converting the dynamic address into a static address that also points to
 - 24 the dynamic Web page.
- 25

1 The Office indicates that **Smith** discloses (at col. 5, lines 10-35 and col. 5,
2 lines 56-65) “generating an instance of a spider-friendly Web page having at least
3 one link with a dynamic address pointing to a dynamic Web page” (as recited in
4 the claim).

5 Applicant submits that the links disclosed by **Smith** have a static address
6 because they point to static Web pages (40 of Fig. 1). At col. 4, lines 4-12, **Smith**
7 states that the “data processing system...places a plurality of web pages 40 for
8 access by remote client stations 35 over network 46....Web pages 40 can contain
9 data including text, graphics, audio files, video files, and other forms of data.”

10 Applicant submits that this sounds like **Smith**’s Web pages are stored intact
11 on a Web server and are not generated anew each time the page is accessed. At
12 the very least , there is nothing disclosed in **Smith** to conclude that its pages are
13 dynamic.

14 Applicant submits that the Office has not shown that **Smith** discloses
15 “generating an instance of a main Web page having at least one link with a
16 dynamic address pointing to a dynamic Web page” (as recited in the claim).

17 The Office indicates that **Griffin** discloses (at col. 3, lines 22-63)
18 “converting the dynamic address into a static address that also points to the
19 dynamic Web page” (as recited in the claim).

20 In the discussion of the Office’s anticipation rejection of claim 23,
21 Applicant explains why **Griffin** does not disclose a conversion from a “dynamic”
22 to a “static address.” Therefore, the reasoning given there apply here as well.

23 Applicant submits that the cited text of **Griffin** fails to disclose any
24 conversion. Applicant asks the Office to point out the exact portion of text that
25 discloses a any static/dynamic address conversion.

1 The text cited by the Office does not mention or discuss any static
2 addresses. The only address that Applicant could locate that is inferentially
3 referenced by the text at col. 3, lines 35-42 is the address listed in the address bar
4 of the "typical home page display 50" illustrated in Fig. 3. The address in that bar
5 is cut-out, enlarged, and shown above in Fig. A.

6 Applicant submits that the address shown in Fig. A is static. **Griffin** never
7 describes this address as dynamic and this address matches the exemplary static
8 address provided in the Application, which is
9 <http://domain.name.com/pagename.htm>.

10 Applicant submits that the "typical home page display 50" illustrated in
11 Fig. 3 is static as well. **Griffin** never describes this Web page as one that is
12 created the moment the page is accessed. **Griffin** never describes this Web page as
13 one that is not stored intact on a Web server, but, instead, it is generated anew
14 each time it is accessed.

15 Applicant submits that this is merely the conventional situation of a static
16 address pointing to a static Web page.

17 **Griffin** does not disclose the "typical home page display 50" illustrated in
18 Fig. 3 as being one that is dynamic. Furthermore, it does not disclose a dynamic
19 address that points to the "typical home page display 50" and a conversion of that
20 address into a static address, like that shown in the address bar of Fig. A above.

21 The address disclosed in col. 5, lines 25-45 is a dynamic address. However,
22 as is conventional, it is one that points to a dynamic Web page. Applicant makes
23 that conclusion because col. 5, lines 34-36 says, "the file 'emc--test.pl' [which is
24 part of the address provided on lines 31-33] is a Perl script.... The web server
25 **runs** this script as step B in FIG. 7." Later, in the description of step F (col. 5,

1 lines 60-62), **Griffin** describes the server as sending a just-generated Web page
2 over the network to the user's Web browser.

3 In accordance with its description of a dynamic Web page provided in the
4 Application, Applicant submits that Web page produced by step F of Fig. 7 of
5 **Griffin** is not stored intact on the Web server, but, instead, is generated anew each
6 time it's Perl script is accessed.

7 Applicant submits that this is merely the conventional situation of a
8 dynamic address pointing to a dynamic Web page.

9 Applicant submits that the Office has not shown that **Griffin** discloses a
10 conversion of a "dynamic address into a static address that also points to the
11 dynamic Web page" (as recited in this claim). Therefore, the combination of the
12 teachings of **Griffin** and **Smith** fails to disclose all of the features and elements
13 recited in this claim.

14 Accordingly, Applicant asks that the Office withdraw its rejection of these
15 claims.

16
17 Claim 54

18 This claim recites:

- 19 • receiving a static address pointing to a dynamic Web page;
 - 20 • parsing the static address to identify at least one value associated
 - 21 with a field within the static address; and
 - 22 • generating a dynamic address incorporating at least one value
 - 23 associated with the field, wherein the dynamic address points to the
 - 24 dynamic Web page.
- 25

1
2 The Office indicates the **Smith** discloses (at col. 5, lines 10-35) “generating
3 a dynamic address incorporating at least one value associated with [a] field [parsed
4 from a static address], wherein the dynamic address points to the dynamic Web
5 page” (as recited in the claim).

6 Applicant submits that **Smith** discloses Web pages being requested using a
7 dynamically created “link”. While the link may be dynamically created, **Smith**
8 (and especially the cited portion) does not disclose that the link is a “dynamic
9 address points to the dynamic Web page.”

10 Indeed, Applicant submits that the Web pages (40 of Fig. 1) of **Smith**
11 appear to be “static.” At col. 4, lines 4-12, **Smith** states that the “data processing
12 system...places a plurality of web pages 40 for access by remote client stations 35
13 over network 46....Web pages 40 can contain data including text, graphics, audio
14 files, video files, and other forms of data.”

15 Applicant submits that this sounds like **Smith**’s Web pages are stored intact
16 on a Web server and are not generated anew each time the page is accessed.
17 Regardless, the Office has not shown objective evidence in **Smith** that supports a
18 conclusion that its web pages are “dynamic.”

19 Furthermore, the cited text of **Smith** does not disclose inclusion of a “field”
20 which was parsed from a static address.

21 Applicant submits that the Office has not shown that **Smith** discloses
22 “generating a dynamic address incorporating at least one value associated with [a]
23 field [parsed from a static address], wherein the dynamic address points to the
24 dynamic Web page” (as recited in the claim). Therefore, the combination of the
25

1 teachings of **Griffin** and **Smith** fails to disclose all of the features and elements
2 recited in this claim.

3 Accordingly, Applicant asks that the Office withdraw its rejection of these
4 claims.

5
6 Claim 56

7 This claim ultimately depends upon independent claim 55. As discussed
8 above, claim 55 is allowable.

9 In addition to its own merits, this dependent claim is allowable for the same
10 reasons that its base claim is allowable. Applicant submits that the Office
11 withdraw the rejection of this dependent claim because its base claim is allowable.
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1 **Dependent Claims**

2 In addition to its own merits, each dependent claim is allowable for the
3 same reasons that its base claim is allowable. Applicant submits that the Office
4 withdraw the rejection of each dependent claim where its base claim is allowable.
5

6 **Conclusion**

7 All pending claims are in condition for allowance. Applicant respectfully
8 requests reconsideration and prompt issuance of the application. If any issues
9 remain that prevent issuance of this application, the Office is urged to contact the
10 undersigned attorney before issuing a subsequent Action.
11

12
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14 Dated: 2-23-04

Respectfully Submitted,

By: 

Kasey C. Christie
Reg. No. 40559
(509) 324-9256 x232
kasey@lee-hayes.com
www.lee-hayes.com